

## REMARKS

In response to the Office Action mailed April 21, 2005, the Applicants respectfully request reconsideration. Claims 1-3, 5, 7-20, 22-31, 33, 78-92 and 106-128 were previously pending in this application. Claims 109, 111-117 and 121 have been amended. No claims have been cancelled. As a result claims 1-3, 5, 7-20, 22-31, 33, 78-92 and 106-128 are pending for examination with claims 1, 17, 83, 92, 109, 115-117 and 121 being independent claims. No new matter has been added.

### Regarding the Restriction Requirement

The Examiner deemed the Restriction Requirement proper and made the Requirement final. However, in this response Applicants amend independent claims 109, 115-117 and 121 to recite the features of claim 1, as originally filed, in combination with dependent claims 5, 10-12 and 14, respectively. As a result, the features recited in claims 109, 115-117 and 121 have been considered previously by the Examiner and consideration of the claims, as amended, presents no further burden. Accordingly and in light of the amendments to claims 109, 115-117 and 121, Applicants respectfully request that the Restriction Requirement be withdrawn and claims 109-128 be considered.

### Regarding the Drawings

The drawings have been objected to under 37 C.F.R. 1.83(a). The Examiner contends that specifying a brightness for a selected lighting effect, a LED lighting unit capable of emitting light of any range of colors, a range or colors, [sic] and specifying motion for at least one selected lighting unit must be shown. As provided in Applicants' Response filed February 3, 2005, specifying a brightness is shown in Fig. 8, reference numeral 880, and specifying a motion is shown Fig. 8, reference numeral 870. Exemplary LED lighting units 40 are shown in Fig. 2. As provided in the specification (Background; Page 5, lines 18-19; and Page 6, lines 27-29), such units include light units capable of emitting light in a range of colors.

In response to Applicants' arguments, the Examiner submits that the claims noted in the objection were examples of deficiencies and that the Applicants "should make all the necessary corrections to eliminate the drawing objections". Applicants respectfully suggest that the drawings accompanying Applicant's Response filed February 3, 2005 illustrate all of the features

of the claims as requested by the Examiner, and in all respects are fully supported by the specification and claims as originally filed. Absent the Examiner's specific objections to a feature set forth in the claims, Applicants are unable to ascertain which features the Examiner considers not shown in the drawings and Applicants are not afforded the opportunity to point out to the Examiner where such features are shown in the drawings and/or described in the specification. Accordingly, objections under 37 C.F.R. 1.83(a) should be withdrawn. At the least, Applicants request that the finality of the Office Action be withdrawn and that the Examiner provide specific objections, if any, that can be addressed by Applicants.

#### Rejections Under 35 U.S.C. §103(a)

In section 6 of the Office Action, independent claims 1, 17, 83 and 92 were each rejected under 35 U.S.C. §103(a) over U.S. Patent No. 6,466,234, to Pyle, et al. (hereinafter Pyle) in view of U.S. Patent No. 5,889,514, to Boezeman (hereinafter Boezeman). Applicants disagree and traverse the rejections of claims 1, 17, 83 and 92.

Claim 1 recites "A system for preparing a lighting sequence, comprising [*inter alia*]: a display interface ... adapted to permit a user to select at least one lighting effect and at least one lighting unit to execute the at least one selected lighting effect, based on the displayed first information, wherein the display interface is adapted to display a grid, wherein the at least one lighting unit is represented at a first position along a first axis of the grid, wherein at least one continuous time interval is represented along a second axis of the grid, and wherein a representation of the at least one selected lighting effect during the at least one continuous time interval is displayed on the grid adjacent to the first position and parallel to the second axis."

Claim 17 recites "A method for preparing a lighting sequence capable of being executed by a controller, comprising [*inter alia*, an act] of ... displaying a grid, wherein the at least one lighting unit is represented at a first position along a first axis of the grid, wherein at least one continuous time interval is represented along a second axis of the grid, and wherein a representation of the at least one selected lighting effect during the at least one continuous time interval is displayed on the grid adjacent to the first position and parallel to the second axis."

Claim 83 recites "A system for preparing and executing at least one lighting sequence, comprising [*inter alia*]: a display interface ... adapted to display a grid, wherein the at least one lighting unit is represented at a first position along a first axis of the grid, wherein at least one

continuous time interval is represented along a second axis of the grid, and wherein a representation of the at least one selected lighting effect during the at least one continuous time interval is displayed on the grid adjacent to the first position and parallel to the second axis.”

Claim 92 recites “A method for preparing and executing at least one lighting sequence, comprising [*inter alia*, an act] of ... displaying a grid, wherein the at least one lighting unit is represented at a first position along a first axis of the grid, wherein at least one continuous time interval is represented along a second axis of the grid, and wherein a representation of the at least one selected lighting effect during the at least one continuous time interval is displayed on the grid adjacent to the first position and parallel to the second axis.”

On page 6 of the Office Action, the Examiner contends that Pyle clearly shows timing control for the lighting effects and lighting units in the scene description table of Fig. 3 and column 5, lines 14-45. Applicants respectfully disagree. Pyle describes a system for controlling lighting including a scene description data structure, where a scene defines lighting circuits and a target state for lights on the circuits. A user can access the scene descriptions and request that a particular scene be enabled by requesting a light controller to enable the target state for each circuit within the scene. Once a scene is requested by a user and enabled, that scene remains enabled until a different scene is requested. The data structure does not include timing control for lighting effects or scenes, and more particularly does not teach or suggest a display interface for selecting a lighting unit to execute a lighting effect, wherein the representation of the lighting effect during a continuous time interval is displayed on a grid.

The scene descriptions in Pyle include a “change time” indicating the time that it will take to change the lights from their current state to their target state (col. 5, lines 7-10). The change time does not control the period of time that the scene or lighting effect is enabled. Rather, the change time merely reflects the time between the scenes or between the target states of the circuits within the scenes. Pyle does not describe, teach or suggest a timing control of the scenes or time period during which the scenes are enabled.

The Examiner contends that Boezeman teaches analogous art. Applicants respectfully disagree. Boezeman describes a tool for laying out audio, video and animation parts of a multimedia title or presentation over a time frame. Different spacers placed onto a graphical representation of a part can play the part for a designated period of time during the multimedia presentation, hide the part for a designated period of time during the multimedia presentation,

change the rate at which the part is played during the multimedia presentation, or move the part along a predetermined path while the part is visible during the multimedia presentation. The parts are digital files that a multimedia computer system processes for presentation on a multimedia display device. Boezeman does not teach or suggest controlling lighting units. The Examiner compares the Boezeman display device to a light unit. Applicants respectfully suggest that the comparison is flawed in that the Boezeman display device is a viewing apparatus, such as a CRT, for presentation of audio and visual computer files and does not provide environmental lighting, as described in Pyle. Nor does the Boezeman provide any teaching or suggestion that the Boezeman display is a lighting unit or light source, such as the exemplary lighting units described by Applicants, including incandescent, LED, fluorescent, halogen, laser, or other type of light source. Further, the lighting units in Pyle do not display audio, video, or animation files as processed by a multimedia computer system as does the display device of Boezeman.

As set forth in MPEP § 2143, three criteria must be met in order to establish a *prima facie* case of obviousness: (I.) there must be some motivation, either in the cited references or in the knowledge generally available to one of ordinary skill in the art, to modify the references; (II.) the references must teach or suggest all of the claimed features; and (III.) there must be a reasonable expectation of success. The teaching or suggestion to modify the references, as well as the reasonable expectation of success, must both be found in the prior art and not based on Applicants' disclosure.

Pyle does not teach or suggest a timing control or specifying a time period during which the light unit scenes are enabled, but rather describes controlling lighting circuits through a user interface, wherein a user can request that one of a number of scene descriptions be enabled. Boezeman, on the other hand, teaches a timed layout of a multimedia presentation. There is no motivation found in Pyle to provide a timing control for enabling the scenes. Neither is there a motivation in Boezeman to use the spacer tool to control other than a multimedia display.

The Applicants respectfully submit that claims 1, 17, 83 and 92 as amended are patentable over the combination of Pyle and Boezeman because the obviousness criteria specified in MPEP §2143 are not met. First, as described in the above remarks, Pyle and Boezeman are not analogous art and there is no motivation to combine the references. Second, Pyle and Boezeman, alone or in any combination, fail to teach or suggest all of the features

recited in each of the Applicants' claims 1, 17, 83 and 92. At the least, Pyle does not teach a timing control and Boezeman does not teach an interface adapted to permit a user to select "at least one lighting unit to execute ... [a] selected lighting effect". Thirdly, since Pyle and Boezeman are not analogous art, there can be no reasonable expectation of success in combining the references.

Claims 2, 3, 5, 7-16, 18-20, 22-31, 33, 78-82, 84-91, 107 and 108 depend directly or indirectly on the independent claims and are thus allowable at least by dependency. Accordingly, Applicants traverse the rejections of the dependent claims 2, 3, 5, 7-16, 18-20, 22-31, 33, 78-82, 84-91, 107 and 108. Applicants respectfully request withdrawal of the rejections of claims 2, 3, 5, 7-16, 18-20, 22-31, 33, 78-82, 84-91, 107 and 108.

#### Regarding Claim 5 and Claim 109

In section 7 of the Office Action, dependent claim 5 was rejected under 35 U.S.C. §103(a) as being obvious over Pyle in view of Boezeman and further in view of U.S. Patent No. 6,361,198 to Reed (hereinafter Reed). Applicants Response filed February 3, 2005 addressed the patentability of claim 109 in connection with the rejection of dependent claim 5. However, in maintaining the Restriction Requirement, the Examiner did not consider those remarks. Applicants repeat the remarks herein and traverse the rejection.

Claims 5 and 109 recite a system for preparing a lighting sequence, "wherein the at least one lighting unit includes at least one LED lighting unit capable of emitting light of any of a range of different colors, and wherein the sequence authoring interface is adapted to permit the user to select at least one color of the light emitted by the at least one LED lighting unit."

The Office Action concedes that Pyle fails to teach a system wherein the lighting unit includes an LED capable of emitting light of any of a range of different colors. In fact Pyle and Boezeman completely fail to disclose or suggest a system for preparing a lighting sequence, comprising *inter alia* a processor coupled to the display interface and supporting a sequence authoring interface adapted to permit a user to select at least one lighting effect and at least one lighting unit wherein the at least one lighting unit includes at least one LED lighting unit capable of emitting light of any of a range of different colors, and wherein the sequence authoring interface is adapted to permit the user to select at least one color of the light emitted by the at least one LED lighting unit, as recited in claims 5 and 109.

However, the Office Action alleges that, in the title and abstract, Reed discloses a method and system for preparing a light sequence capable of being executed by a controller wherein a lighting unit includes at least an LED capable of emitting light of any of a range of different colors, and wherein a sequence authoring interface is adapted to permit a user to select a color of light emitted by the LED (col. 3, lines 25-57 of Reed). The Office Action then alleges that one of ordinary skill in the art would have been motivated to combine the teachings of Pyle with Reed because Reed teaches an interactive light display that uses a computer to allow display routines to be conveniently custom designed and easily exchanged and downloaded from the Internet (col. 2, lines 1-16 of Reed). The Applicants respectfully disagree with the foregoing assertions.

Reed is directed to a light display in the form of a Christmas tree (col. 3, lines 50-51), in which bunches of fiber optic strands extend from LEDs that are positioned on the branches of the tree (col. 4, lines 3-6). Reed discloses that an advantage of such a tree is that less fiber is used when compared to conventional Christmas trees in which lights are placed in the base of the tree (col. 1, lines 38-42; col. 2, lines 39-45). Reed also discloses a computer with a monitor for controlling and viewing the control of the tree (col. 3, lines 53-55).

As discussed above, MPEP § 2143 sets forth three criteria must be met in order to establish a *prima facie* case of obviousness: (I.) there must be some motivation, either in the cited references or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine reference teachings; (II.) the references must teach or suggest all of the claimed features; and (III.) there must be a reasonable expectation of success. The teaching or suggestion to modify the references, as well as the reasonable expectation of success, must both be found in the prior art and not based on Applicants' disclosure.

The Applicants respectfully submit that the combinations of Pyle and Reed, and Boezeman and Reed are improper, because at least the first obviousness criterion set forth in MPEP § 2143, namely a motivation to combine reference teachings, is completely lacking. Pyle discloses a system for controlling conditions in an environment, such as lighting conditions, for example, in an office. The system retrieves data structures that define target states for selected lights in the environment (abstract). The system receives an input from a user interface and, in response, controls the lights to attain target states of the lights corresponding to the user input (abstract).

Nowhere in Reed or Pyle is it suggested that a fiber optic illumination device as disclosed in Reed should replace office lights as disclosed in Pyle to overcome the Office Action's stated deficiency of Pyle. In fact, Pyle discloses nothing more than conventional white light fixtures; and Reed only suggests that fiber optic illumination devices are advantageous for use in Christmas trees, where such fiber optic illumination devices permit LED illumination sources to be located in the branches of the Christmas tree, such that less fiber is used than in conventional trees where the illumination sources are located in the base of the tree.

Therefore, the combination of Pyle and Reed is improper because there is lack of motivation to modify Pyle in the manner suggested in the Office Action. As such, the combination of Pyle and Reed fails the first criterion for establishing *prima facie* obviousness according to MPEP §2143. Therefore claims 5 and 109 are patentable over the combinations of Pyle and Reed. The combination of Boezeman and Reed is improper for the reasons provided in the above remarks regarding the combination of Pyle and Boezeman.

#### Regarding Claim 10 and Claim 115

In section 10 of the Office Action, dependent claim 10 was rejected under 35 U.S.C. §103 as being obvious over Pyle in view of Boezeman and further in view of U.S. Patent No. 5,334,992 to Rochat (hereinafter Rochat). Applicants Response filed February 3, 2005 addressed the patentability of claim 115 in connection with the rejection of dependent claim 10. However, in maintaining the Restriction Requirement, the Examiner did not consider those remarks. Applicants repeat the remarks herein and traverse the rejection.

Claim 115 recites a system for preparing a lighting sequence, "wherein the sequence authoring interface is adapted to permit the user to select a starting color and an ending color for the at least one selected lighting effect."

The Office Action concedes that Pyle fails to teach a system comprising permitting a user to select a starting color and an ending color for the lighting effect. In fact both Pyle and Boezeman completely fail to disclose or suggest a system for preparing a lighting sequence, comprising *inter alia* a processor coupled to the display interface and supporting a sequence authoring interface adapted to permit a user to select a starting color and an ending color for the at least one selected lighting effect, as recited in claims 10 and 115.

However, the Office Action alleges that, in Fig. 5 of Rochat and col. 6, lines 45-60, Rochat discloses analogous art including a starting color and an ending color for a lighting effect. The Office Action then alleges that one of ordinary skill in the art would have been motivated to combine Pyle with Rochat because Rochat teaches an interface that enhances the ease of color selection and manipulation in a computer system by utilizing display graphics to assist in the visualization of the available color selections, and that further advantages of Rochat generally apply to increased accuracy, predictability and ease of use of the interface (col. 4, lines 13-68). The Applicants respectfully disagree with the foregoing assertions.

Rochat is directed to an interface system that allows a user to select and control colors used in graphic images generated by a computer system (abstract). Accordingly, Rochat discloses a system for rendering two-dimensional graphic images on a computer screen, not for controlling the projection of light for the purpose of illumination of a room, like Pyle. The portion of Rochat to which the Office Action refers discloses a system for specifying a first color at a first location on a two-dimensional display (i.e., a start color), and a second color at a second location on a two-dimensional display (i.e., an end color), such that a continuous shading can be provided between the first location and the second location. Accordingly, the start location and the end location are spatially separated, and do not in any way relate to projection of light of color lighting effect from a lighting unit.

The Applicants respectfully submit that claims 10 and 115, as amended, are patentable over the combinations of Pyle and Rochat or Boezeman and Rochat because at least the second obviousness criterion specified in MPEP §2143 is not met; namely Pyle, Boezeman and Rochat, alone or in any combination, fail to teach or suggest all of the features recited in the Applicants' claims 10 and 115.

Firstly, as the Office Action acknowledges, both Pyle and Boezeman fail to teach a system (or method) in which an LED is capable of emitting light of any of a range of different colors, and wherein the sequence authoring interface is adapted to permit the user to select a color of light emitted by the LED; more specifically, neither Pyle nor Boezeman discloses “a system for preparing a lighting sequence, comprising *inter alia* a display interface adapted to display a grid, wherein the sequence authoring interface is adapted to permit the user to select a starting color and an ending color for the at least one selected lighting effect,” as recited in claims 10 and 115.



Secondly, Rochat does not disclose a system for preparing a lighting sequence, comprising *inter alia* “A system for preparing a lighting sequence, comprising [*inter alia*]: ... a processor coupled to [a] display interface and supporting a sequence authoring interface adapted to permit a user to select at least one lighting effect and at least one lighting unit ... wherein the sequence authoring interface is adapted to permit the user to select a starting color and an ending color for the at least one selected lighting effect,” as recited in amended claims 10 and 115. Instead, Rochat discloses a start color to be displayed at a first location in a graphic image and an end color to be displayed at a second location in a graphic image. The information displayed on the screen does not permit a user to select a color to be displayed by a lighting unit, as recited in claims 10 and 115. The information displayed on the computer screen in Rochat is nothing more than a representation of a two-dimensional image.

Accordingly, none of Pyle, Boezeman and Rochat discloses a sequence authoring interface that is adapted to permit the user to select a starting color and an ending color for the at least one selected lighting effect. Therefore, the combination of either Pyle and Rochat or Boezeman and Rochat fails at least the second criterion for establishing *prima facie* obviousness according to MPEP §2143. Claims 10 and 115 therefore are patentable over both the combinations of Pyle and Rochat and Boezeman and Rochat.

In view of the foregoing, and for the sake of brevity, the Applicants submit that it is not necessary to discuss the impropriety of combining Pyle and Rochat or Boezeman and Rochat based on lack of motivation or lack of reasonable expectation of success according to the other obviousness criteria set forth in MPEP §2143. However, the Applicants reserve the right to argue that the combinations of Pyle and Rochat and Boezeman and Rochat indeed are improper based on either or both of these criteria, if deemed necessary in the future.

Accordingly, claims 10 and 115 are patentable over the combinations of Pyle and Rochat, and Boezeman and Rochat.

#### Regarding Claim 11 and Claim 116

In section 6 of the Office Action, dependent claim 11 was rejected under 35 U.S.C. §103(a) over Pyle in view of Boezeman. Applicants Response filed February 3, 2005 addressed the patentability of claim 116 in connection with the rejection of dependent claim 11. However,

in maintaining the Restriction Requirement, the Examiner did not consider those remarks. Applicants repeat the remarks herein and traverse the rejection.

The Office Action alleges that Pyle teaches a method and system for preparing a lighting sequence capable of being executed by a controller (Abstract). Further, the Office Action alleges the sequence authoring interface is adapted to permit the user to specify a transition effect between a first lighting effect and a second lighting effect (Fig. 3-5; col. 5, lines 14-45).

Claims 11 and 116 recite a system for preparing a lighting sequence, “wherein the sequence authoring interface is adapted to permit the user to select a transition effect for a transition between a first lighting effect and a second lighting effect.”

As previously discussed herein, Pyle does not disclose a transition effect for a transition between a first effect and a second effect. At most, Pyle discloses a time that it takes to change between a first state and a second state. The scene descriptions in Pyle include a “change time” indicating the time that it will take to change the lights from their current state to their target state (col. 5, lines 7-10). The change time does not control the period of time that the scene or lighting effect is enabled. Rather, the change time merely reflects the time between the scenes or between the target states of the circuits within the scenes. Pyle does not describe, teach or suggest an interface adapted to permit the user to select a transition effect for a transition between a first lighting effect and a second lighting effect. Accordingly, claims 11 and 116 are patentable over Pyle and Boezeman.

#### Regarding Claim 12 and Claim 117

In section 11 of the Office Action, dependent claim 12 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Pyle in view of Boezeman and further in view of U.S. Patent No. 5,945,993 to Akaza, et al. (hereinafter Akaza). Applicants Response filed February 3, 2005 addressed the patentability of claim 116 in connection with the rejection of dependent claim 11. However, in maintaining the Restriction Requirement, the Examiner did not consider those remarks. Applicants repeat the remarks herein and traverse the rejection.

Claims 12 and 117 recite a system for preparing a lighting sequence, “wherein the sequence authoring interface is adapted to permit the user to specify a priority for a first lighting effect which shares a temporal overlap with a second lighting effect.”

The Office Action concedes that Pyle fails to teach a system which permits the user to specify a priority for a first lighting effect which temporally overlaps with a second lighting effect. In fact, both Pyle and Boezeman completely fail to disclose or suggest a system for preparing a lighting sequence, comprising *inter alia* a processor coupled to the display interface and supporting a sequence authoring interface adapted to permit the user to specify a priority for a first lighting effect which shares a temporal overlap with a second lighting effect.

However, the Office Action alleges that Akaza teaches a system which permits the user to specify a priority for a first lighting effect which temporally overlaps with a second lighting effect (Col. 9, lines 50-67). The Applicants respectfully disagree.

Akaza is directed to a graph display device including a section for inputting functional expression data and a graph display section for displaying the expression data in a selected color (abstract). In the graph display section, a graph is produced in a same color as the color selected for the expression data (abstract). Akaza teaches that by displaying graphs in different colors, it is possible to display multiple graphs in a visibly distinct manner (col. 1, lines 36-40). Akaza further teaches that, if two graphs on the computer screen spatially overlap, the color in which the region of overlap is displayed is determined by pre-selected priority of the colors (col. 9, lines 50-55).

The Applicants respectfully submit that claims 12 and 117 are patentable over the combinations of Pyle and Akaza or Boezeman and Akaza because at least the second obviousness criterion specified in MPEP §2143 is not met; namely Pyle, Boezeman and Akaza, alone or in any combination, fail to teach or suggest all of the features recited in Applicants' claims 12 and 117.

Firstly, as the Office Action acknowledges, both Pyle and Boezeman fail to teach a system which permits the user to specify a priority for a first lighting effect which temporally overlaps with a second lighting effect; more specifically neither Pyle nor Boezeman discloses a system for preparing a lighting sequence, comprising *inter alia* a display interface adapted to permit the user to specify a priority for a first lighting effect which shares a temporal overlap with a second lighting effect, as recited in claims 12 and 117.

Secondly, Akaza does not disclose a system for preparing a lighting sequence, comprising *inter alia* "A system for preparing a lighting sequence, comprising [*inter alia*]: ... A system for preparing a lighting sequence, comprising [*inter alia*]: ... a processor coupled to [a]

display interface and supporting a sequence authoring interface adapted to permit a user to select at least one lighting effect and at least one lighting unit ... wherein the sequence authoring interface is adapted to permit the user to specify a priority for a first lighting effect which shares a temporal overlap with a second lighting effect.” More specifically, Akaza does not disclose selecting a priority among first and second lighting effects to be executed by a lighting unit. Instead, Akaza merely discloses that the colors displayed on a computer screen can be prioritized. That is, when two graphs of different overlap on a computer screen, one is selected as the “priority” and that graph is displayed on the computer screen. Accordingly, none of Pyle, Boezeman and Akaza discloses a processor supporting a sequence authoring interface adapted to permit a user to specify a priority for a first lighting effect which shares a temporal overlap with a second lighting effect, as recited in claims 12 and 117. Thus, the combination of either Pyle and Akaza or Boezeman and Akaza fails at least the second criterion for establishing *prima facie* obviousness according to MPEP §2143. Claims 12 and 117 therefore are patentable over both the combinations of Pyle and Akaza and Boezeman and Akaza.

In view of the foregoing, and for the sake of brevity, the Applicants submit that it is not necessary to discuss the impropriety of combining Pyle and Akaza or Boezeman and Akaza based on lack of motivation or lack of reasonable expectation of success according to the other obviousness criteria set forth in MPEP §2143. However, the Applicants reserve the right to argue that the combinations of Pyle and Akaza and Boezeman and Akaza indeed are improper based on either or both of these criteria, if deemed necessary in the future.

Accordingly, claims 12 and 117 are patentable over the combinations of Pyle and Akaza, and Boezeman and Akaza.

#### Regarding Claim 14 and Claim 121

In section 6 of the Office Action, dependent claim 14 was rejected under 35 U.S.C. §103(a) over Pyle in view of Boezeman. Applicants Response filed February 3, 2005 addressed the patentability of claim 116 in connection with the rejection of dependent claim 11. However, in maintaining the Restriction Requirement, the Examiner did not consider those remarks. Applicants repeat the remarks herein and traverse the rejection.

Claims 14 and 121 recite a system for preparing a lighting sequence, “wherein the sequence authoring interface is adapted to permit the user to provide instructions to execute the at least one selected lighting effect based upon at least one external stimulus.”

The Office Action alleges that Pyle teaches a system wherein the sequence authoring interface is adapted to permit a user to provide instructions to execute and optionally alter the lighting effect based upon at least one external stimulus (col. 5, lines 46-60 of Pyle).

At the location cited in the Office Action, Pyle refers to FIG. 6 of Pyle and discloses the lighting system may be implemented in a distributed computer system. Each computer comprising the system has a processor and input/output devices and user interface components 604, which interact with user control point devices 605. Accordingly, in the cited portion, Pyle at most discloses that user inputs can be accepted to control the lighting system. By contrast, claim 14 recites that “the sequence authoring interface is adapted to permit [a] user to provide instructions to execute the at least one selected lighting effect based upon at least one external stimulus.” Accordingly, a user input provides instructions such that an external stimulus can alter execution of a lighting effect. While Pyle discloses a system adapted to permit a user input, the interface is not adapted such that, subsequent to the user input, an external stimulus can alter the execution of a lighting effect.

For the reasons provided in the above remarks with respect to the independent claims, Boezeman is not analogous art and does not teach or suggest controlling lighting units.

Accordingly, claims 14 and 121 are patentable over Pyle and Boezeman.

### **CONCLUSION**

In view of the foregoing amendments and remarks, reconsideration is respectfully requested. This application should now be in condition for allowance; a notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicant's attorney at the telephone number listed below.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 06-1448.

Respectfully submitted,

Date: July 21, 2005

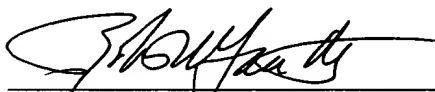
**Customer No: 25181**

Patent Group

Foley Hoag, LLP

155 Seaport Blvd.

Boston, MA 02210-2600



Robert W. Gauthier, Reg. No. 35,153

Attorney for Applicants

Tel. No. (617) 832-1175

Fax. No. (617) 832-7000